

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION	)	
	)	
	)	
	)	
THIS DOCUMENT RELATES TO:	)	MDL No. 2419 Dkt. No 1:13-md-2419 (RWZ)
All Suits Against the Saint Thomas Entities	)	
	)	
	)	
	)	

**JOINT STIPULATION REGARDING REPLY TO PSC'S OPPOSITION TO SAINT  
THOMAS ENTITIES' MOTION FOR CLARIFICATION REGARDING LIBERTY  
INDUSTRIES, INC.'S SUMMARY JUDGMENT BRIEFING**

On December 1, 2014, Saint Thomas West Hospital f/k/a St. Thomas Hospital, Saint Thomas Health, and Saint Thomas Network (the “Saint Thomas Entities”) moved this Court for clarification to expressly note in its order adjudicating Liberty Industries, Inc.’s Motion for Summary Judgment that such order has no effect on the comparative fault allegations of the Saint Thomas Entities, or in the alternative, to provide the Saint Thomas Entities with an opportunity to participate in briefing after they had been provided an opportunity to obtain further discovery. *See* Dkt. No. 1567. On December 19, 2014, the PSC filed its opposition to the Saint Thomas Entities’ Motion for Clarification. *See* Dkt. No. 1604. The impacted parties, which consist of the PSC and the Saint Thomas Entities, agree to the Saint Thomas Entities’ request to file a reply to the PSC’s opposition.

Dated: December 22, 2014

Respectfully submitted,

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*Plaintiffs' Steering Committee and Tennessee  
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**CERTIFICATE OF SERVICE**

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 22nd day of December, 2014.

*/s/ Sarah Kelly*  
Sarah P. Kelly